

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

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M.J.J.,  
Plaintiff,

v.

POLK COUNTY and DARRYL L.  
CHRISTENSEN,

Defendants,

Case No. 15-CV-433

and

WISCONSIN COUNTY MUTUAL  
INSURANCE CORPORATION,

Intervenor.

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J.K.J.,  
Plaintiff,  
vs.

POLK COUNTY and DARRYL L.  
CHRISTENSEN,

Defendants,

Case No. 15-CV-428

and

WISCONSIN COUNTY MUTUAL  
INSURANCE CORPORATION,

Intervenor.

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**DECEMBER 7, 2016 DECLARATION OF SCOTT NARGIS**

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SCOTT NARGIS declares, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, that the following is true and correct:

1. I am Jail Captain of the Polk County Jail (the “Jail”). I make this declaration in support of the Polk County’s Response to Plaintiffs’ Motion For Leave to Re-Open Discovery, to

Supplement Summary Judgment Response To Polk County, For Leave to Investigate Amendment Of Pleadings, For Continuing Trial Date, Motion To Compel and Sanctions Against Polk County, and based upon my own personal knowledge of the facts attested to herein and upon my review of the business records at the Jail.

2. Attached hereto as Exhibit A are documents from the Polk County investigation file relating to Allen Jorgenson, which were produced to the plaintiffs on May 12, 2016 in response to their written discovery requests, and which are Bates numbered PCJ0003737 through PCJ0003768.

3. The County's response to the plaintiffs' April 5, 2016 written discovery was coordinated by me, with assistance from other County staff and counsel.

4. The County maintains an electronic file of the documents generated during the Jorgenson investigation.

5. When asked to obtain documents related to the Jorgenson investigation, I pulled the electronic file, believing it contained all of the documents relating to the Jorgenson investigation.

6. When the plaintiffs requested copies of the handwritten letters from inmate N.S., I saw that the letters had not been scanned into the electronic file; however, I was able to locate them in the County's physical files.

7. On or about November 10, 2016, I was asked to attempt to locate certain emails from Sgt. Steve Schaefer, which were referenced in my investigation report relating to Officer Jorgenson. I found that those documents had not been moved into the electronic file, but I was able to find them within the physical files.

8. In connection with responding to this motion, I verified that all of the documents within the County's physical files relating to the Jorgenson investigation have now been produced.

9. Pursuant to County practice, Jorgenson's resignation letter was stored in Jorgenson's personnel file; it was not filed with the materials related to the investigation of the allegations of improper relationships with inmates and coworkers that took place in early 2012.

Dated this 7th day of December, 2016.

  
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Scott Nargis